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BOARD OF WATER WORKS TRUSTEES
L.D. McMULLEN, Ph.D., P.E., CEO AND GENERAL MANAGER

September 1, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Draft Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico

Des Moines Water Works (DMWW) applauds the Task Force for undertaking this national effort to reduce the Gulf of Mexico hypoxia. DMWW's monitoring of the Raccoon River in central Iowa, which contributes to the Mississippi/Atchafalaya River Basin, has shown an upward trend of nitrates for the last 20 years. Having the largest nitrate removal facility in the world, nothing would delight us more than to turn that facility into a museum piece.

Throughout this document, point sources, such as wastewater discharges are lumped in with non-point source contributors such as agricultural run-off, leading the reader to believe that they share equally in the problem. In 1999 our monitoring of the Raccoon River showed that approximately 90% of the annual nitrogen load as nitrate was contributed from April to July. Assuming that the point source contributors, such as wastewater treatment plants, contribute relatively consistently throughout the year, their contribution amounts to only about 15% of the total and less than 1% during periods of heavy non-point source contribution. Based on this information, the overall value to the gulf of a 30% reduction in nutrients from non-point sources, would be almost six times that of a similar reduction in point source contribution. While we agree that both point and non-point sources contribute to the nitrate problem, we encourage more emphasis be placed on non-point sources to insure that resources and regulations are in direct correlation with contribution.

Comments regarding Draft Action Plan:

1. Which of the "Coastal Goals" should be in the final Action Plan, and if not any of these, please suggest alternatives? Are the "Within Basin" and "Quality of Life" Goals appropriate or how should they be modified?

Each of the three goals has merit. *DMWW's recommendation* is to combine all three goals and state as shown below. This identifies what's to be accomplished, where it's to be accomplished, by whom and when. The why, reasoning and/or methods, can then be in the goal objectives. This goal provides a specific measure as to what's to be accomplished, it allows for standards in reduction of either nitrogen and/or phosphorous, and allows flexibility in how it's to be accomplished so that future changes in science and technology can be utilized without re-writing the goal.

LONG TERM GOAL --- "By the year 2010, reduce the 5-year running average areal extent of the Gulf of Mexico hypoxia to less than 5,000 square kilometers through identification of specific practical and cost effective actions by all states, tribes and all categories of sources within the Mississippi/Atchafalaya River Basin to reduce the annual discharges of nutrients by 30%."

GOAL OBJECTIVES --- To utilize best current science and technology to reduce annual discharges of nitrogen to the gulf from the Mississippi/Atchafalaya River Basin. Best science today indicates the average nitrogen loads should be reduced by 30% from the 1980-1996 average to make significant progress toward the long-term goal.

To utilize best management practices in reducing the loss of excess nutrients from agricultural operations, which may include riparian buffers and constructed or

restored wetlands.

To utilize best technology in reducing point source nutrient contribution within the Mississippi/Atchafalaya River Basin

GOAL OUTCOMES --- To restore and protect the waters of the 31 States and tribal lands within the Mississippi/Atchafalaya River Basin and their aquatic ecosystems in order to protect public health and aquatic life, and make a positive impact on downstream waters.

To improve the communities and economic conditions across the Mississippi/Atchafalaya River Basin, with specific emphases on agriculture, fisheries and recreation sectors, through improved public and private land management and a cooperative, incentive based approach.

To re-evaluate the goal every five (5) years only allows for one evaluation midway through the identified 10-year project period (2000-2010). *DMWW recommends* evaluating the project, especially to determine trends, every 4 years. Evaluation of trends may be in the "Best Judgement" of the Task Force based on pounds of nitrogen sold, amount of manure spread, water utility nitrate monitoring results, weather conditions, etc. This review every 4 years allows for two evaluations during the project period with the second being two years from the project conclusion. Two years will allow for changes in action plans, extension of the project period, or whatever other changes need to be made to accomplish project success. At the end of the 10 years if the goals have been accomplished or are seen as progressing to that end, then begin evaluating every five years to insure continued momentum and good water quality is sustained.

2. Are the Implementation Actions listed and the dates associated with them appropriate?

To maintain continuity of the timeline #6 should become #4, #4 should become #5 and #5 should become #6.

The timeline while aggressive seems appropriate.

Adaptive Management: Action, Monitoring and Research

DMWW recommends an Implementation Action that identifies how the Task Force will provide overall coordination for the project. There needs to be some sort of centralized clearinghouse for gathering and exchanging information. When and how will that happen?

Funding the National Effort: Clean Rivers/Clean Gulf Budget Initiatives

Project success is contingent on funding availability for the activities outlined in the Implementation Actions. *DMWW recommends* an additional task be added which identifies the role of the Task Force in seeking and coordinating funds.

Basin-wide Goal: State/Tribal -led Strategies within a National Commitment

DMWW supports the initiative proposal of an Omnibus Mississippi-Gulf Restoration Fund and that resources be allocated based on an estimate of the relative proportion of the need and cost for remedial measures basin-wide.

Indicators of Success/Progress

DMWW agrees with the listed Environmental and Programmatic Indicators as being appropriate indicators of trends and changes in trends. The Economic Indicators, however, are a list of indicators that may be affected by the trends, but nothing is stated as to what positive measurable changes are expected.

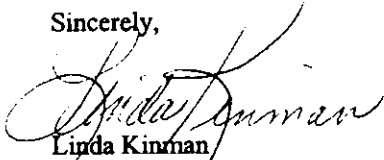
3. Provide examples of any effective nutrient management State/Tribal program successes or challenges which can be highlighted in the final Action Plan; and

4. Are the listings of Federal programs in the section "Funding the National Effort" complete?

Both examples of effective management successes or challenges and the listing of Federal funding are comprehensive and we would not have anything to add at this time.

We appreciate the opportunity to participate in the development of the "Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico" and to being an active participant in the overall success of the initiative. If anyone has questions or would like further clarification of items in our comment document, please contact Linda Kinman, Research/Regulatory Coordinator, Des Moines Water Works, 2201 Valley Drive, Des Moines, IA 50321, (515) 283-8706 or by e-mail at kinman@dmww.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Kinman".

Linda Kinman
Research/Regulatory Coordinator for

L.D. McMullen Ph.D., P.E.
CEO and General Manager